

1 A. Jeff Ifrah, Esquire (Admitted *Pro Hac Vice*)  
2 IFRAH PLLC  
3 1717 Pennsylvania Avenue  
4 Suite 650  
5 Washington, D.C. 20006  
6 Telephone: (202) 524-4140  
7 Facsimile: (202) 524-4141  
8 Email: jeff@ifrahlaw.com

9 Craig S. Denney, Esquire  
10 Nevada Bar No. 6953  
11 Snell & Wilmer L.L.P.  
12 50 West Liberty Street, Suite #510  
13 Reno, NV 89501  
14 775.785.5440 (office)  
15 775.830.2432 (mobile)  
16 775.785.5441 (fax)  
17 [cdenney@swlaw.com](mailto:cdenney@swlaw.com)

18 Attorneys for Defendants,  
19 *Viable Marketing Corporation and Chad Elie*

20 **IN THE UNITED STATES DISTRICT COURT**  
21 **FOR THE DISTRICT OF NEVADA**

22 PARTNER WEEKLY, LLC,  
23  
24 Plaintiff.

25 v.

26 VIABLE MARKETING CORP., a Florida  
27 Corporation; CHAD EDWARD ELIE,  
28 individually and in his capacity as an officer of  
VIABLE MARKETING CORP.; and DOE  
DEFENDANTX I-X, inclusive,  
Defendant.

Case No. 2:09-cv-02120-PMP-LRL

**MOTION TO WITHDRAW AS  
ATTORNEYS OF RECORD FOR  
DEFENDANTS CHAD ELIE AND VIABLE  
MARKETING CORP.**

29 **COME NOW** A. Jeff Ifrah, Esq. of the law firm Ifrah PLLC and Craig S. Denney of the  
30 law firm Snell & Wilmer L.L.P. and respectfully move to withdraw as counsel of record for  
31 Defendants Chad Elie and Viable Marketing Corp., and in support thereof state the following:  
32

- 1 1. Mr. Elie is presently represented by Sigal Chattah, Esq., who will remain as counsel for
- 2 Mr. Elie;
- 3 2. The court has entered a judgment on the merits as to Viable Marketing Corp. and
- 4 therefore the case is closed as to Viable Marketing Corp.;
- 5 3. Undersigned counsel has given all parties written notice of their intention to withdraw
- 6 prior to submitting this request to this Court; and
- 7 4. Granting this Motion to Withdraw would not delay any proceedings in this matter.

8 WHEREFORE, the undersigned counsel respectfully requests that this court enter an  
9 Order granting A. Jeff Ifrah and Craig S. Denney permission to withdraw their representation  
10 herein, and relieving them of any further responsibility in this case.  
11  
12

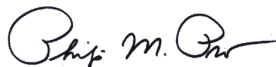
13 DATED: April 8, 2013

IFRAH PLLC

14 By: /s/ A. Jeff Ifrah

15 A. Jeff Ifrah  
16 IFRAH PLLC  
17 1717 Pennsylvania Avenue  
Suite 650  
Washington, D.C. 20006  
Telephone: (202) 524-414-  
Facsimile (202) 524-4141  
Email: jeff@ifrahlaw.com

18 IT IS SO ORDERED.

19 

20 PHILIP M. PRO  
21 UNITED STATES DISTRICT JUDGE

SNELL & WILMER LLP

22 Dated: April 9, 2013.

23 By: /s/ Crag S. Denney

24 Craig S. Denney, Esquire  
Nevada Bar No. 6953  
Snell & Wilmer L.L.P.  
50 West Liberty Street, Suite #510  
Reno, NV 89501  
775.785.5440 (office)  
775.830.2432 (mobile)  
775.785.5441 (fax)  
[cdenney@swlaw.com](mailto:cdenney@swlaw.com)

27 Attorneys for Defendant  
28

Chad Elie

**CERTIFICATE OF SERVICE**

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On April 8, 2013, I caused to be served a true and correct copy of the foregoing **MOTION TO WITHDRAW** by the method indicated:

- ☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- ☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- ☐ **BY EMAIL:** by emailing a PDF of the document(s) listed above to the email addresses of the individual(s) listed below.
- ☐ **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.
- ☐ **BY PERSONAL DELIVERY:** by causing personal delivery by \_\_\_\_\_, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.
- ☒ **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.

/s/ Dawn Calhoun  
An employee of Snell & Wilmer L.L.P.